

**COMPARISON OF WIRELESS COALITION'S PROPOSED PERFORMANCE MEASURES AND AMERITECH'S CURRENT PERFORMANCE MEASURES**

WIRELESS COALITION'S PROPOSED MEASURES <sup>11</sup>	AMERITECH'S CURRENT MEASURES <sup>12</sup>	NOTES <sup>13</sup>
"FOC/EC Dates Met" – a measure to track "the percentage of Wholesale Special Access circuits installed. . . on or before the FOC/EC due dates. . . ."	"On Time Performance (the rate of installation due dates met)."	Ameritech expressly describes "On Time Performance" as a "key" performance measure. (Ameritech Ex. 4.0 at 6:125-26.)
"New Circuit Failure Rate" – a measure to track "the percentage of a Requesting Carrier's new Wholesale Special Access circuits (i.e., circuits installed for 30 days or less) . . . that fail during each month . . ."	"Installation Quality (measured by the rate of "troubles" reported within 30 days of installation)."	Ameritech expressly describes "Installation Quality" as a "key" performance measure. (Ameritech Ex. 4.0 at 6:125-30.)
"Failure Rate" – a measure to track "the percentage of a Requesting Carrier's Wholesale Special Access circuits . . . that fail during each month . . . ."	"Failure Rate (the percentage of circuits that experienced an out-of-service condition in the month)."	
"Repair Time" – a measure to track "the period between the time a Requesting Carrier submits a Trouble Report relating to a Wholesale Special Access circuit and the time at which the Provisioning Carrier closes the Trouble Report . . . ."	"Repair Restoral Time (average time to restore service for those circuits that fail)."	Ameritech expressly describes "Repair Restoral Time" as a "key" performance measure. (Ameritech Ex. 4.0 at 6:125-33.)
The Wireless Coalition proposed that "Repair Time must not exceed the length of time it takes a Provisioning Carrier to repair Wholesale Special Access circuits it provides to itself or any of its affiliates . . . and in any event must not exceed 3 hours." (Wireless Coalition Br., Ex. A at § 731.310(j).)	"Percentage of Trouble Reports Restored within 3 Hours."	
"Repeat Failure Rate" – a measure to track "the percentage of a Requesting Carrier's Wholesale Special Access circuits . . . in connection with which more than one Trouble Report is opened during any thirty-day period . . . ."	"Repeat Reports (circuits for which trouble is reported within 30 days of a previous trouble report)."	
"Network Availability" – a measure to track "the percentage of time a Requesting Carrier's Wholesale Special Access circuits . . . are not Out of Service during each month . . . ."	"Percentage of Network Availability (calculated by taking the total out of service time and dividing it by the total time all circuits are available)."	

<sup>11</sup> Unless otherwise noted, see Wireless Coalition Br., Ex. A at § 731.105.

<sup>12</sup> See Ameritech Ex. 4.0 at 4; see also fn. 10 hereto.

<sup>13</sup> Because Verizon fails to provide monthly performance reports, no detailed comparison of the Wireless Coalition's proposals and Verizon's performance metrics can be made. However, based on Holland's testimony, it is clear that Verizon tracks on-time installation performance, the number of days installations are late, network availability, mean time to repair, firm order confirmation and other wholesale special access measures. (See Verizon Ex. 6.0 at 9:178-81, 10:197-98; Holland, Tr. 7/23/02 Tr. 225:8-10.)

WIRELESS COALITION'S ADDITIONAL PROPOSED MEASURES <sup>14</sup>	
PROPOSED MEASURE	Notes
"Chronic Failure" a measure to track "Wholesale Special Access circuit[s] in connection with which a Trouble Report is opened on four separate occasions during any rolling twelve-month period . . . ."	This proposed measure is simply an extension of Ameritech's "Repeat Reports" measure.
"Days Late" a measure to track "the average number of days during each month that Wholesale Special Access circuits a Provisioning Carrier installs for a Requesting Carrier were installed after FOC/EC due dates. . . ."	This proposed measure is purely diagnostic and a corollary of Ameritech's "On Time Performance" measure.
"Engineering Complete" - "where facilities to complete a Wireless Wholesale Special Access service request are available [this measure tracks] the date by which the Provisioning Carrier must complete all required engineering relating to an order for a Wireless Wholesale Special Access service . . . and also must advise the Requesting Carrier of the date on which the service shall be installed. In the event facilities . . . are not available [this measure tracks] the date by which the Provisioning Carrier must: (1) advise the Requesting Carrier of the facilities that are not available; and (2) provide the Requesting Carrier with a good faith estimate of the date on which the requested service shall be installed . . . ."	This proposed measure is purely diagnostic. It will assist in tracking the engineering progress of requests for wireless wholesale special access circuits, which process currently is not tracked and often is unduly lengthy.
"Firm Order Confirmation" - for wireless providers, a measure to track "the document or electronic record by which a Provisioning Carrier notifies a Requesting Carrier of the date on which an ordered service shall be installed."	This proposed measure is purely diagnostic. It will assist in tracking the progress of requests for wireless wholesale special access circuits and establishing due dates, which currently are not provided on a timely basis. (See Wireless Coalition Ex. 1.0 at 7:137-48.)
"FOC/EC Past Due" - a measure to track "the number of a Requesting Carrier's Wholesale Special Access service orders in connection with which a Provisioning Carrier has not provided an FOC/EC as of the end of each month . . . ."	This proposed measure is simply a corollary of "Firm Order Confirmation".
"Past Due Circuits" - a measure to track "the total number of Wholesale Special Access circuits a Provisioning Carrier fails to install for a Requesting Carrier on or before the FOC/EC due date . . . ."	This proposed measure is purely diagnostic and is a corollary of Ameritech's "On Time Performance" metric.

<sup>14</sup> The Wireless Coalition's additional proposed measures are closely related to measures Ameritech and Verizon currently report or track and each relates to an aspect of wholesale special access service in connection with which Wireless Coalition members experience significant problems. (See generally Wireless Coalition Exs. 1.0 - 7.0.) As noted in the chart, four of the six additional proposed measures are purely diagnostic, thus, the failure to satisfy these measures will not trigger a remedy. (See Wireless Coalition Br. Ex. A at § 731.315.)